

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JEFFREY HARRIS, Derivatively On Behalf of) Case No. 07-CV-9841 (SHS)
CITIGROUP, INC.,)

Plaintiff,)
vs.)

CHARLES PRINCE, et al.,)

Defendants,)

-and-)

CITIGROUP, INC., a Delaware corporation,)

Nominal Defendant.)

GARY CINOTTO, Derivatively On Behalf of) Case No. 07-CV-9900 (SHS)
CITIGROUP, INC.,)

Plaintiff,)
vs.)

CHARLES PRINCE, et al.,)

Defendants,)

-and-)

CITIGROUP, INC.,)

Nominal Defendant.)

BENJAMIN NATHANSON, Derivatively On) Case No. 07-CV-10333 (JSR)
Behalf of CITIGROUP, INC.,)

Plaintiff,)
vs.)

CHARLES PRINCE, et al.,)

Defendants,)

-and-)

CITIGROUP, INC.,)

Nominal Defendant.)

[Caption continued on following page.]

SAM COHEN, Derivatively On Behalf of)	Case No. 07-CV-10344 (SHS)
CITIGROUP, INC.,)	
)	
Plaintiff,)	
vs.)	
)	
CHARLES PRINCE, et al.,)	
)	
Defendants,)	
)	
-and-)	
)	
CITIGROUP, INC.,)	
)	
Nominal Defendant.)	
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WALTER E. RYAN, JR., Derivatively On)	Case No. 07-CV-11581 (UA)
Behalf of CITIGROUP, INC.,)	
)	
Plaintiff,)	
vs.)	
)	
CHARLES PRINCE, et al.,)	
)	
Defendants,)	
)	
-and-)	
)	
CITIGROUP, INC.,)	
)	
Nominal Defendant.)	

**PLAINTIFF GARY CINOTTO'S NOTICE OF MOTION AND MOTION TO
CONSOLIDATE ALL RELATED SHAREHOLDER DERIVATIVE ACTIONS AND
APPOINT LEAD COUNSEL FOR PLAINTIFFS**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Plaintiff Gary Cinotto, by and through his counsel, will hereby move this Court on February 8, 2008 at 3:00 p.m. before Judge Sidney H. Stein, at 500 Pear Street, New York, NY for an Order (submitted concurrently herewith) to: (i) consolidate *Harris v. Prince, et al.*, 07-cv-9841 (SHS); *Cinotto v. Prince, et al.*, 07-cv-9900 (SHS); *Nathanson v. Prince, et al.*, 07-cv-10333 (JSR); *Cohen v. Citigroup, Inc., et al.*, 07-cv-10344 (SHS); *Ryan v. Prince, et al.*, (07-11581), and all other related Citigroup, Inc. shareholder derivative actions subsequently filed in this Court; (ii) appoint Johnson Bottini, LLP as Lead Counsel and (iii) the Law Offices of Thomas G. Amon as Liaison Counsel for these actions.

This motion is based on this Notice of Motion, the Memorandum of Points and Authorities in support thereof, the Declaration of Frank J. Johnson, and any arguments made before the Court at the hearing of this Motion and all other papers and pleadings on file in this action.

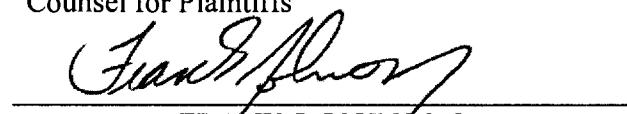
Dated: January 28, 2008



THOMAS G. AMON

LAW OFFICES OF THOMAS G. AMON
500 Fifth Ave., Suite 1650
New York, NY 10110
Counsel for Plaintiffs

Dated: January 25, 2008



FRANK J. JOHNSON

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FRANK J. JOHNSON
FRANCIS A. BOTTINI, JR.
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